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February 4, 2022

VIA MAIL AND EMAIL

Tammy M. Leache
Family Felony Violence Unit
100 West Patrick Street
Frederick, Maryland 21701
TLeache@statesattorney.us

RE: Norris Bernard Ellis
Case No. C-10-CR-21-000535
Communication Regarding Discovery

Dear Ms. Leache,

Hope you are well. I am writing to you regarding outstanding discovery. From my review of the discovery, it appears that I may be missing several items. Would you please review your file, and ask the officers involved in the investigation of this case to review their files as well, and provide me with all the documents and information that might be missing related to Mr. Ellis' case, pursuant to Maryland Rule 4-263.

1. Video Surveillance.

First, it appears that many video recordings observed by the officers were not provided. Would you provide all surveillance footage in your possession and your agents' possession located at the following addresses:

- 47 E. All Saints Street (Corner office; East and West on E. All Saints Street - referenced in the discovery pp.29 and 39 by Detective McKinney).
- Bushwallers bar (p.29 and 41 from Detective McKinney).
- E. Patrick Street (Black Label Tattoo - referenced in the discovery p.37 by Detective Radtke).
- 35 E. All Saints Street (Tyler Duncan Reality Partners - referenced in the discovery p.39 by Detective McKinney).
- Carroll Creek and E. All Saints garages (Both garages - referenced in the discovery p.33 by Detective Green).

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- 8349 and 8353 Revelation Ave from July 3 to July 4, 2021 (referenced in the discovery p.42 by Detective McKinney).
- 8400 Revelation Ave and 401 Sagner Ave (referenced in the discovery p.42 by Detective McKinney).
- E. Church Street and N. Market Street (Natural Lawn of America area - referenced in the discovery p.42 by Detective McKinney).
- 51 S. Market Street (restaurant La Paz located face at the entrance of Carroll Creek Linear Park - referenced in the discovery p.33 by Detective Green)

If these videos are not in your possession, or in your agents' possession, please provide a courtesy explanation.

Second, I would like to obtain the entire recordings available from the hours of 12:00 a.m. to 5:00 a.m. on July 4, 2021, from the video surveillance cameras located at the following addresses:

- The corner of N. Market Street to E. Church Street (referenced in the discovery p.34 by Detective Green).
- Colonial Jewelers at 1 S. Market (referenced in the discovery p.33 by Detective Green).
- Ice Street at E South Street (referenced in the discovery p.33 by Detective Green).

Only of few excerpts from these videos have been provided. I would request the entire footage in your possession and/or in the possession of your agents. If these videos are not in your possession, or in your agents' possession, please provide a courtesy explanation.

Finally, some videos provided appear to be incomplete or inaccurate. First, the Bridge West video at Carroll Creek (referenced on p.33 by Detective Green) appears to be inaccurate. The video that was provided was solely for a time in the afternoon; there was no video provided for the alleged time of the crime between 1:00am and 3:00am. Would you please review this video and provide the relevant time frame for this case? Second, the 55 and 57 S. Carroll Street videos (videos from General Engineering Company referenced in the discovery on pp. 29, 35 and 38 by Detective McKinney), appear to be incomplete. The discovery describes a male subject observed at 2:28am (p. 39). This footage has not been provided. There is no video for 2:28am. Please provide the entire footage. If these videos are not in your possession, or in your agents' possession, please provide a courtesy explanation.

2. Recorded Statements and/or Notes.

In addition, would you confirm that there are no video and/or audio recorded statements from Ms. Popovich and Ms. Caple to Detective McKinney or any other officers, either on July 5, 2021, or July 6, 2021, or at any other time (besides the three body camera recordings already provided and received).

Would you please provide the notes that the Detectives or any other officers took of these interviews? If these notes are not in your possession, or your agents' possession, please provide a courtesy explanation.

3. Seized Items.

Would you please confirm that no items were seized from Mr. Ellis' home pursuant to the search warrant?

I appreciate your time and cooperation regarding this matter. Please do not hesitate to contact me if you have any questions of concerns. I look forward to hearing from you,

Sincerely,

Isabelle Raquin

